

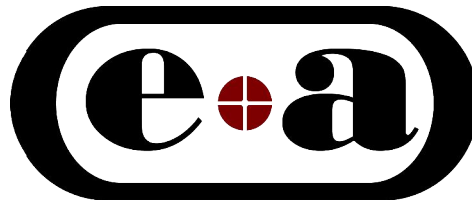
STORM WATER POLLUTION PREVENTION PLAN

U-Pick-It Inc.

7700 East Winner Road
Kansas City, Missouri 64125

Lancaster County, Nebraska

Prepared By:



Engineering Answers

E & A CONSULTING GROUP, INC.

ENGINEERING • PLANNING • ENVIRONMENTAL COMPLIANCE • FIELD SERVICES

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February 24, 2012

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BACKGROUND

Storm water runoff is generated when precipitation from rain and snowmelt events flows over land or impervious surfaces and does not percolate into the ground. As the runoff flows over the land or impervious surfaces (paved streets, parking lots, and building rooftops), it accumulates debris, chemicals, sediment or other pollutants that could adversely affect water quality if the runoff is discharged untreated. The primary method to control storm water discharges is the use of best management practices (BMPs). In addition, most storm water discharges are considered point sources and require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Most states are authorized to implement the Storm water NPDES permitting program.¹

The State of Missouri Department of Natural Resources (MDNR) has been granted permitting authority by the Environmental protection agency (EPA) for the NPDES permitting program. The MDNR has written a Missouri State Operating Permit, General Permit, MO-R60A000, for storm water discharges associated with industrial activity associated with motor vehicle salvage yards and scrap metal recycling operations.

Activities that take place at industrial facilities, such as material handling and storage, are often exposed to the weather. As runoff from rain or snowmelt comes into contact with these activities, it can pick up pollutants and transport them to a nearby storm sewer system or directly to a river, lake, or coastal water. To minimize the impact of storm water discharges from industrial facilities, the NPDES program includes an industrial storm water permitting component that covers 10 categories of industrial activity that require authorization under an NPDES industrial storm water permit for storm water discharges.² Regulations define automotive recyclers as a Category (vi) industrial facility which requires and NPDES permit for storm water.

This Storm Water Pollution Prevention Plan (SWPPP) was established to identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges from the facility associated with industrial activity. This SWPPP also describes the implementation of BMPs which are used to reduce pollutants in storm water discharges from industrial activity at the facility.

The Storm Water Pollution Plan for U-Pick-It Inc. has been prepared to meet the requirements for Missouri State Operating Permit, General Permit, MO-R60A000.

¹ EPA NPDES Website, Storm water Program, Overview, http://cfpub.epa.gov/npdes/home.cfm?program_id=6

² EPA NPDES Website, Storm water Discharges from Industrial Facilities, <http://cfpub.epa.gov/npdes/stormwater/indust.cfm>

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manages the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (See 18 U.S.C. §1001 and 33 U.S.C. §1319)

U-Pick-It Inc.

Harry Hansen
Print Name

President
Title

Signature

Date

NOI Preparer/Reviewer

E&A Consulting Group

Zachary Jilek, CPESC, CISEC
Print Name

Manager of Environmental Compliance
Title

Signature

Date

Caleb Snyder, EIT
Print Name

Storm Water Permitting Specialist
Title

Signature

Date

ANNUAL REVIEW

The following table shows dates of the required annual review of the Storm Water Pollution Prevention Plan.

DATE	REVISIONS REQUIRED & NOTED BELOW? (CIRCLE ONE)	REVIEWER SIGNATURE
	Yes None required	
	Yes None required	
	Yes None required	
	Yes None required	
	Yes None required	

REVISION RECORD

The table below documents the description and date of revisions and amendments made to the Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall be updated and necessary changes implemented within 30 days after any SWPPP review indicating changes are required, after recognition of any deficiencies discovered during facility inspections, and after any construction or change in design, operation, or maintenance of the facility having a significant impact on the discharge, or potential discharge, of pollutants from the facility.

REVISION DESCRIPTION	DATE	SIGNATURE

Section 1: POLLUTION PREVENTION TEAM

Introduction
Pollution Prevention Team Members
Responsibilities

Introduction

The intent of this Storm Water Pollution Prevention Plan (SWPPP) is to minimize the discharge of pollutants in storm water runoff from the industrial activities performed at U-Pick-It Inc. located at 7700 East Winner Road, Kansas City, Missouri 64125.

U-Pick-It Inc. receives and processes used motor vehicles for parts resale and for scrap. Upon arrival at the facility, vehicles are checked for leaks of fuel, lubricants, and coolants. If detected, measures are taken to contain the leaks. Vehicles are inventoried and fluids drained. Some parts are removed from the vehicles at this time; other parts are removed by customers after the vehicle has been processed by U-Pick-It employees. Processed vehicles are stored in the yard in the vehicle storage area. Vehicles are crushed as needed to provide storage capacity for incoming inventory. No automobile shredding is conducted at the facility. Scrap metal is also taken in at this facility. Customers bringing scrap metal to this facility are weighed on the scale and then the scrap metal is off loaded in the scrap metal storage area. The scrap metal is then loaded onto trucks for shipment to an outside company for recycling.

U-Pick-It Inc. has implemented the best management practices described in this plan, established a pollution prevention team, performs regular storm water facility inspections, and continues to conduct and develop employee training for storm water pollution prevention.

Also implemented at the facility are activities, prohibition of practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to waters of the United States. The Storm Water Controls or Best Management Practices (BMP's) for U-Pick-It Inc. are:

Good Housekeeping

Areas which may contribute pollutants to the storm water system are kept clean.

Minimization of Exposure

Where practicable materials and equipment are stored under cover to minimize the exposure of pollutants to the storm water system. Containment structures may also be used where practicable.

Preventive Maintenance

A preventive maintenance program for inspection and upkeep of equipment that could contribute pollutants to the storm water system is in place.

Spill Prevention & Response Procedures

Spill response, control, and clean-up procedures that minimize impact to the storm water system are in place.

Inspections

This plan establishes regular inspection of facility areas that could possibly contribute pollutants to the storm water system.

Employee Training

Employees have been informed of the goals of the Storm Water Pollution Prevention Plan. On-going training is conducted to re-emphasize the goals and importance of storm water pollution prevention and includes such topics as spill response, good housekeeping, and material management practices.

Sediment and Erosion Controls

This plan identifies the areas of the facility that, due to topography, land disturbance (e.g. construction, landscaping, site grading), or other factors, have potential for soil erosion. This plan covers the means used to control erosion and sediment build-up such as implementation of structural, vegetative, and/or stabilization BMPs to prevent or control on-site erosion and sedimentation.

Management of Runoff

This plan describes the storm water runoff management practices, i.e. permanent structural BMPs for the facility. These are typically used to divert, infiltrate, reuse, contain, or otherwise reduce pollutants in discharges.

Salt Storage Piles

There are no storage piles of salt or piles containing salt at this facility.

Sector Specific BMPs

The following are sector specific BMPs for the auto salvage industry:

For *Spill and Leak Prevention Procedures*: Vehicles to be processed will be drained of all fluids upon arrival at the site or as soon thereafter as feasible, or some other means used to prevent spills and leaks.

For *Inspections*: Vehicles arriving at the site will be inspected for leaks immediately upon arrival or as soon thereafter as feasible. Areas used for fluid storage will be inspected regularly for signs of leakage.

For *Employee Training*: Employee training will address proper handling (collection, storage, and disposal) of used oil, anti-freeze, fuel, solvents, and mercury switches.

For *Management of Runoff*: The facility will consider using berms if oily parts are stored uncovered outdoors and will consider installation of filtering devices or oil/water separators as needed to manage runoff.

The following are sector specific BMPs for the scrap recycling facilities:

For *Inbound recyclable material control*: Create a written list of materials that will not be accepted at the facility and materials that will be accepted, but require special handling procedures.

For *Scrap material storage (bulk solid material)*: Conduct periodic inspections. Conduct preventative maintenance as necessary.

For *Scrap processing operations*: Stabilize high traffic areas (e.g. concrete pads, gravel, and pavement around processing equipment) where practicable.

For *Vehicle and equipment washing*: Designate an area for cleaning and avoid washing vehicles or equipment outdoors. Inspect cleaning area regularly and train employees on proper washing procedures.

For *Erosion and sediment control*: Minimize run-on from adjacent properties using diversion dikes, berms, or equivalent.

Pollution Prevention Team Members

A pollution prevention team is in place and consists of the following U-Pick-It Inc. employees:

Team Coordinator: Adam Moran, General Manager

Team Member(s): Nick Tordoff, Assistant Manager
Chris Caldron, Head Counter/Sale Manager

Responsibilities

Pollution Prevention Team members participate in the Storm Water Facility Inspections; are kept aware of changes in the facility's storm water program by the Team Coordinator; and are expected to educate and train those they work with in good storm water pollution prevention practices. The Team Coordinator schedules the Storm Water Facility Inspections; updates the SWPPP; maintains all reports and records; and establishes storm water training.

Section 2: SITE DESCRIPTION

Facility Information
Activities at Facility
General Location Map
Facility Site Map

Facility Information

Facility Name:	U-Pick-It Inc.		
Owner/Operator:	Harry Hansen		
Facility Address:	7700 East Winner Road, Kansas City, Missouri 64125		
Mailing Address:	7700 East Winner Road, Kansas City, Missouri 64125		
Latitude/Longitude:	39°06' 24" N	94°29' 33" W	
Section/Township/Range:	Section 31	T50N	R32W
NPDES Industrial Category:	Six (vi): Metal scrap yards, salvage yards, automobile junkyards, and battery reclaimers.		
Standard Industrial Classification (SIC) Code(s):	5015, Motor Vehicle Parts, Used 5093, Scrap and Waste Materials		
NPDES Permit Number:	MO-R60A000, Missouri State Operating Permit, General Permit Authorization No. MO_____		
MS4/CSO Operator:	City of Kansas City and Jackson County		
Name of Receiving Water Body:	Blue River (P), Mouth to 6, 49N, 32W, MO-0417		
Facility Size:	16.12 Acres		
Impervious Surface Estimate:	65%		
Precipitation Information:	Average Annual Precipitation = 36 inches Wet Season = May through July		
SARA Title III Reporting:	No		
Monitoring Requirements:	Currently there are no monitoring requirements		

Activities at Facility

U-Pick-It Inc. processes used motor vehicles for parts resale and for scrap. Upon arrival at the facility, vehicles are checked for any leaking fluids and moved to a holding area, located indoors for processing. Incoming vehicles with leaks detected are immediately processed or measures are taken to contain the leak. Some vehicles brought to the facility have been involved in collisions resulting in a lost of most fluids at the collision site.

For processing, vehicles are inventoried and taken to the processing area where the vehicle's fluids are drained. Vehicles are placed onto fluid recovery racks fabricated with secondary containment. Fluids drained from the vehicles include oil, gasoline, antifreeze, and refrigerant. Approved recovery units are used to recover refrigerants. After the fluids are drained, catalytic converters are removed from the vehicle and stored. Processed vehicle bodies are stored indoors and outdoors in the vehicle storage areas. The outdoor vehicle holding and storage areas are a combination of asphalt and earth surfaces. The indoor vehicle holding and storage areas are a combination of asphalt and concrete surfaces.

Drained fluids are stored in the Fluid Storage Area. The Fluid Storage Area is located indoors. Four tanks are stored in the area one for each of the following: used/waste oil, antifreeze, gasoline, and diesel. Each tank has its own individual sized secondary containment. Fluids recovered from vehicles are disposed of as follows:

Fluid Type	Handling
Refrigerant	Collected by U-Pick-It employees and recycled/disposed of by an outside company.
Antifreeze	Collected in above-ground storage tank and sold to an outside company.
Motor Oil	Collected in above-ground storage tank and recycled with an outside company.
Brake Fluid	Collected and combined with used motor oil.
Transmission Fluid	Collected and combined with used motor oil.
Power Steering Fluid	Collected and combined with used motor oil.
Window Washer Fluid	Collected and combined with used antifreeze.
Gasoline	Collected in above-ground tanks for re-use in company vehicles.
Diesel Fuel	Collected in above-ground tanks for re-use in company vehicles.

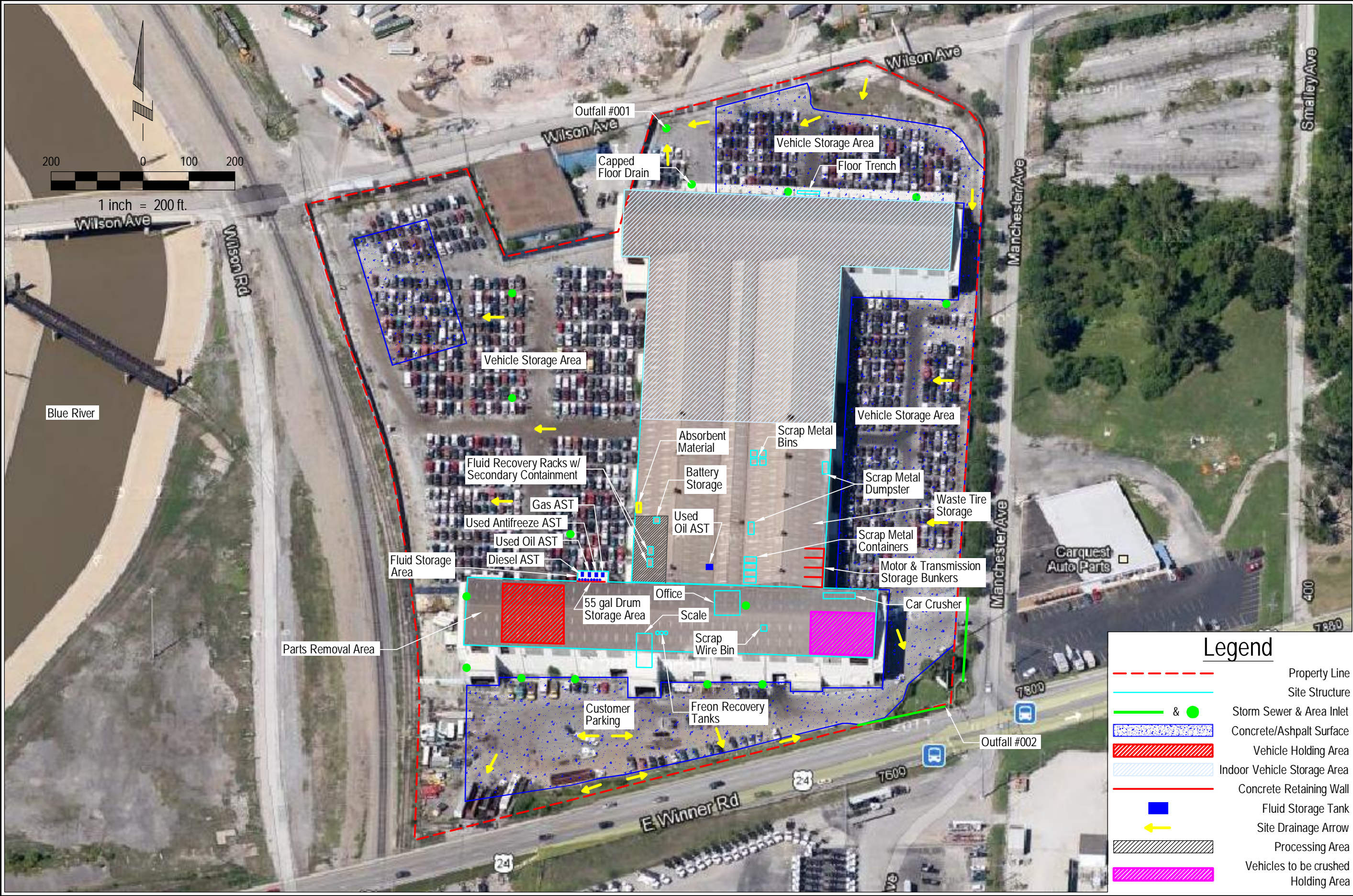
U-Pick-It Inc. crushes vehicles as needed. The car crusher and the crushing area are located indoors. Before crushing, engines, motors, radiators, batteries and starters are removed and

separated out by metal types for recycling. The car crusher rests on steel skids and a fluid holding tank integrated in the crusher collects and contains residual fluids that drain during the crushing process. Crushed vehicles are loaded onto trailers and taken off-site to another company for shredding. The car crushing area is cleaned up once the crushing is complete. No automobile shredding is conducted at the facility.

Batteries, cores, starters, catalytic converters, and motors that are not sold are recycled. Batteries are stored indoors. As unusable batteries are removed from vehicles they are palletized for shipment to an outside recycler. Batteries are managed as a universal waste at this facility. Tires are either resold or left on crushed vehicles sent out to be shredded. Because U-Pick-It Inc. has more than 500 waste tires on-site they have obtained a Tire Dealer License, License number 11-11-9987849. Waste tires are stored indoors in a designated area. Since most parts sold are removed by U-Pick-It Inc. customers, employees daily patrol the yard to pick up loose parts and scrap left by the customers.

U-Pick-It Inc. has a preventive maintenance program for all major equipment. Facility personnel maintain the equipment and tools for processing vehicles. Fork-lift, pay loader, skid loader, and car crusher maintenance is conducted by both U-Pick-It Inc. employees and outside service providers. U-Pick-It Inc. conducts weed control activities by mowing.

U-Pick-It Inc. is bordered to the North by an industrial area, to the South by E. Winner Rd. and across E. Winner Rd. is Custom Truck & Equipment, to the West by the Blue River, and to the East by Carquest Auto Parts and undeveloped land. Surface drainage from this facility is collected in grate inlets located throughout the facility. The grate inlets eventually discharge into the Blue River.



Legend

- Property Line
- Site Structure
- Storm Sewer & Area Inlet
- Concrete/Ashpalt Surface
- Vehicle Holding Area
- Indoor Vehicle Storage Area
- Concrete Retaining Wall
- Fluid Storage Tank
- Site Drainage Arrow
- Processing Area
- Vehicles to be crushed Holding Area

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U-Pick-It, Inc.

JACKSON COUNTY, MISSOURI

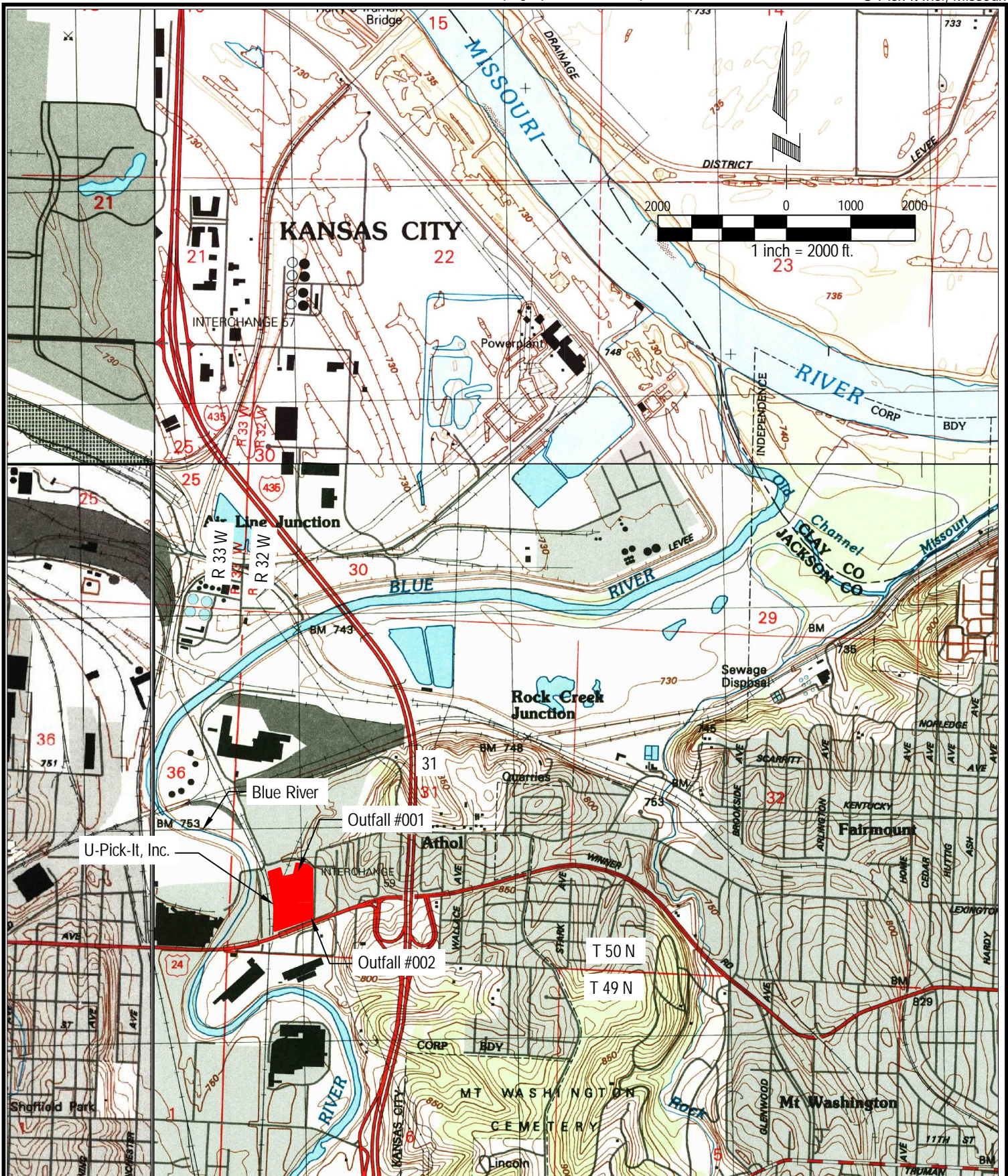
PROJECT

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3	02/22/2012	1" = 200'
4	02/22/2012	1 of 1

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Caleb Snyder



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Job No.: P2012.085.001

Date: 02/22/12

Drawn by: CMS

Checked By: ZAJ

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USGS Quad Map Kansas City, MO

Section 3: RECEIVING WATERS & WETLANDS

Name of Receiving Waters
State Resource Waters and Public Drinking Water Supply Stream Segments
Special Aquatic Sites
Discharge through MS4
Water Quality Standards
Water Quality Impaired Receiving Waters

Name of Receiving Waters

The nearest named and designated receiving water within Rules of Department of Natural Resources, Division 20-Clean Water Commission, Chapter 7-Water Quality for U-Pick-It Inc. is the Blue River, MO-0417. The Blue River, MO-0417 is a class P water body. Class P water bodies are streams that maintain permanent flow even in drought periods.

State Resource Waters, National Resource Waters, or a losing stream

The Blue River, MO-0417 near U-Pick-It Inc. is not classified as a State Resource Water, National Resource Water, or a losing stream.

Special Aquatic Sites

There are no special aquatic sites (sanctuaries, wetlands, mud flats, vegetated shallows, coral reefs, or riffle and pool complexes) in the area of U-Pick-It Inc.

Discharge through MS4

U-Pick-It Inc. is part of the Kansas City, Missouri municipal separate sewer system (MS4).

Water Quality Standards

The water quality standards applicable to the Blue River are Rules of Department of Natural Resources, Division 20-Clean Water Commission, Chapter 7-Water Quality. The Blue River in the area of U-Pick-It Inc. is part of the Blue River Basin, Sub-basin Blue River Outlet, number 10300101-106 water body ID MO-0417. Other water quality standards applicable to the facility are Rules of Department of Natural Resources, Division 60-Safe Drinking Water Commission.

Water Quality Impaired Receiving Waters

The Blue River (Water body ID MO-0417) is identified as an impaired water in the State of Missouri.¹ The listed impairment is Bacteria and the listed source is Urban NPS. Because U-Pick-It Inc. is connected to Kansas City, Missouri Water Services Department's sanitary sewer they should not contribute to this impairment.

¹ Missouri Secretary of State Code of State Regulations, <http://www.sos.mo.gov/adrules/csr/current/10csr/10c20-7.pdf>

Section 4: POTENTIAL POLLUTANT SOURCES

Facility Areas, Activities, and Pollutants Exposed to Storm Water
Spills and Leaks
Salt Storage
Monitoring Data Summary

Facility Areas, Activities, and Pollutants Exposed to Storm Water

Facility Area & Outfall #	Activity	Possible Pollutants
Crushing Area (Indoors)	<ul style="list-style-type: none"> Car Crushing 	<ul style="list-style-type: none"> Residual Oils & Grease Metals Total Suspended Solids
Vehicle Storage Areas (Indoors & Outdoors) (Outfall #001 & 002)	<ul style="list-style-type: none"> Processed Vehicle Storage Parts Removal 	<ul style="list-style-type: none"> Residual Oils & Grease Metals Total Suspended Solids
Vehicle Processing Areas (Indoors)	<ul style="list-style-type: none"> Vehicle processing Fluids drained and stored in Fluid Storage Area Refrigerants removed Trash and loose debris removed from incoming cars 	<ul style="list-style-type: none"> Gasoline Oil Antifreeze Assorted Fluids Total Suspended Solids
Scrap Metal Area (Indoors)	<ul style="list-style-type: none"> Scrap metal storage 	<ul style="list-style-type: none"> Metals Oils & Grease Total Suspended Solids
Battery Storage (Indoors)	<ul style="list-style-type: none"> Used battery storage 	<ul style="list-style-type: none"> Metals Battery Acid
Aboveground Storage Tanks (Indoors)	<ul style="list-style-type: none"> Storage of recovered/drained fluids, 1000gal Antifreeze, 500gal Used/Waste Oil, 500gal Gasoline Storage of 500gal of diesel for equipment fuel 	<ul style="list-style-type: none"> Used Oil and Grease Used Antifreeze Gasoline and Diesel Fuel Metals Total Suspended Solids
Vehicle Holding Areas (Indoors)	<ul style="list-style-type: none"> Incoming vehicles checked for leaks Leaking vehicles have fluids drained immediately or measures are taken to contain the leak Non-leaking vehicles held for processing 	<ul style="list-style-type: none"> Oil and Grease Assorted Fluids Metals Total Suspended Solids
Equipment Refueling Area (Indoors)	<ul style="list-style-type: none"> Equipment and company vehicle refueling 	<ul style="list-style-type: none"> Gasoline and Diesel Fuel Oils and Grease Total Suspended Solids
Scale (Indoors) (Outfall #001)	<ul style="list-style-type: none"> Incoming and outgoing recyclable material 	<ul style="list-style-type: none"> Metals Total Suspended Solids
Motor & Transmission Storage (Indoors)	<ul style="list-style-type: none"> Storage of removed motors and transmissions 	<ul style="list-style-type: none"> Residual Oils & Grease Gasoline and Diesel Fuel

Spills and Leaks

Areas where potential spills and leaks are more likely to occur are where fluids are removed from vehicles and transferred to their appropriate storage tank located in the Fluid Storage Area. Any spills and leaks should be contained before entering the on-site storm sewer or leaving the site. Absorbent material is available to collect small spills immediately after they occur.

The following spills shall immediately reported by the Head Counter Sales Manager to the Missouri Department of Natural Resources (MDNR) at the phone numbers listed below:

1. Spills of any amount to a waterway or beneath the surface of the land;
2. Oil spills upon the surface of the land in excess of 25 gallons;
3. Spills of hazardous substances upon the surface of the land of 100 pounds or more.

Spill reporting phone numbers:

(816) 622-7000 during business hours, Kansas City Regional Office (MDNR)
(573) 634-2436 24 hour, Environmental Emergency Hotline (MDNR)
(800) 424-8802 24 hour, National Response Center (NRC)

U-Pick-It Inc. has also implemented a Spill Prevention, Control, and Countermeasure Plan (SPCC) as required for facilities with an aggregate above-ground storage capacity of 1,320 gallons. In case of spills or leaks U-Pick-It Inc. will also follow any reporting guidelines, procedures, and requirements listed in the SPCC.

The table on the following page shall be used to record significant spills and leaks of oil or hazardous substances occurring in exposed areas or that drain to a storm water conveyance. As required, this table includes spills and leaks that happened within the three years prior to the date of this Storm Water Pollution Prevention Plan. If additional reporting is required, U-Pick-It Inc. will notify Local and/or Federal agencies. If additional guidance is needed U-Pick-It Inc. will contact the Kansas City Regional Office (MDNR) for more information.

Salt Storage

There are no storage piles of salt at U-Pick-It Inc.

Significant Spill and/or Leak Record									
Month & Day	Recorder's Initials	Spill	Leak	Location	Material	Quantity	Reason	Storm Water Exposed (Y/N)	Preventive Measure
2012									
2013									
2014									
2015									
2016									
2017									

Section 5: STORM WATER CONTROLS

Best Management Practices (BMPs)
Sector Specific BMPs
Controls on Other Specific Activities

Best Management Practices (BMPs)

U-Pick-It Inc. has selected to implement the following best management practices for the facility areas and pollutants as indicated.

Good Housekeeping – All facility areas

- To the extent possible, materials are stored indoors or in a covered area.
- Fluids drained from vehicles are reused or recycled and stored in labeled containers.
- Clean-up procedures are in place, including the use of dry absorbent materials or other clean-up methods to collect, dispose of, or recycle spilled or leaked fluids.
- An adequate supply of dry absorbent material is kept on-site and disposed of properly. Used absorbent is never disposed of in vehicles to be crushed.
- Trash containers and storage areas are kept clean to minimize pollutants to storm water.
- Signage is posted on site informing customers that this facility operates under an NPDES permit.
- Salvaged vehicle hoods to remain closed when not in use.
- Drums, tanks, and containers are properly labeled and checked for leaks during routine SPCC inspections and routine visual inspections.
- Batteries are stored indoors on pallets away from high traffic areas.
- Drain pans are used to catch fluid leaks from vehicles or equipment until the vehicle fluids are drained or equipment is repaired.

Minimization of Exposure – Vehicle Holding and Storage Areas, Processing Area, Fluids Storage Area

- Incoming vehicles are checked for fluid leaks.
- Drain pans are used under all leaking vehicles waiting for processing.
- Fluids are removed from vehicles before being stored in Vehicle Storage Areas.
- Aboveground storage containers are located on level surfaces with secondary containment or with absorbent materials nearby.
- Equipment maintenance activities are performed indoors when practical or a ground cover used and removed following maintenance activity.
- Practice is to keep hoods down where vehicles are stored.
- Keep high traffic areas free of debris to minimize tracking.

Preventive Maintenance – Company vehicles, Pay loaders, Skid loaders, Fork lifts, Car crusher

- A preventative maintenance program has been developed for upkeep and maintenance of major equipment.
- Routine maintenance is conducted by both employees and outside service providers.
- Equipment is inspected daily by the operator to ensure no leaks have occurred.

Spill Prevention and Response Procedures – All facility areas

- Preventive measures include proper material storage and handling with absorbent materials located where spills are most likely to occur.
- An SPCC plan has been developed and implemented for this facility. The SPCC plan addresses the proper storage, handling, and transfer of oil products.
- Aboveground storage containers have secondary containment or have absorbent material nearby and are located on level surfaces. Contents of secondary containment tanks will be pumped out as needed by a fluid recycler.
- Any spills that may occur are immediately contained, cleaned-up, and the cleaning materials disposed of properly.
- When refueling, vehicles and/or equipment are parked as close to the pump as possible.
- Used fuel storage containers are kept on a level surface with absorbent material nearby.
- Spills of any amount to a waterway or beneath the surface of the land and all oil spills upon the surface of the land resulting in a spill or leak from an above-ground storage tank greater than 50 gallons are reported by the Facility Owner to the Missouri Department of Natural Resources (MDNR) at the following phone numbers:

(816) 622-7000 during business hours, Kansas City Regional Office (MDNR)
(573) 634-2436 24 hour, Environmental Emergency Hotline (MDNR)
(800) 424-8802 24 hour, National Response Center (NRC)

U-Pick-It Inc. will consult their SPCC for additional reporting requirements. If additional reporting is required, U-Pick-It Inc. will notify Local and/or Federal agencies.

Inspections – All facility areas

- Daily visual walkthroughs and drive-arounds are performed to look for things out of the ordinary.
- Adjacent public streets are inspected after rainfall events for evidence of sediment tracking from the site.
- Tanks, valves, hoses, and containers are regularly inspected and checked for signs of leaks, spills, wear, or corrosion.
- SPCC inspections are conducted monthly to inspect aboveground containers for integrity and to ensure that the SPCC plan is being effectively carried out.

- It is every employee's daily responsibility to be aware of materials, residues, and trash that could contaminate or be washed away in storm water. This expectation is communicated to employees during training sessions and individual discussions.

Employee Training – All facility areas

- SWPPP procedures are discussed at monthly safety meetings.
- Training on spill prevention and response procedures is provided annually to hands-on employees.
- Training on storm water pollution prevention is provided annually to hands-on employees.

Topics to be covered during the annual training shall include:

1. The purpose and requirements of the Storm Water Pollution Prevention Plan.
2. Spill prevention and response procedures.
3. Reporting procedures.
4. Proper handling (collection, storage, and disposal) of used oil, antifreeze, fuel, solvents, and mercury switches.
5. Good housekeeping practices.
6. Lead-acid battery management.
7. Current and proposed Best Management Practices.
8. Parts handling and storage.

The table on the following page shall be used as a record of each year's annual training, including the date of training, instructor, and employees' attendance. (Make additional copies to document each year's training.)

Print Name	Signature

Instructor's Name:_____ **Date:**_____

Sediment and Erosion Controls – Vehicle Storage Areas

- Outdoor storage areas are a combination of paved, asphalt and earth surfaces to help prevent on-site erosion and sedimentation.
- If sedimentation build-up occurs, the areas are cleared out and the material used to fill in low areas in the yard.
- If construction takes place, silt fencing or other structural vegetative, or stabilization BMP's will be used as needed to control on-site erosion and sedimentation.

Management of Runoff – All facility areas

- The BMPs implemented for Good Housekeeping and Spill Prevention and Response help to manage and prevent pollutants from entering storm water runoff.
- Vehicle fluid removal is performed under cover, keeping potential pollutants from entering storm water runoff. Vehicle processing occurs indoors.

- A portion of this facility's discharge is to a vegetated storm water ditch further reducing the opportunity for pollutants to enter receiving waters.

BMPs for management and disposal of vehicle parts containing mercury:

- Mercury switches are handled as a universal waste at this facility.
- Mercury switches are scheduled for pickup and recycling twice a year.
- All employees who handle or manage mercury-added products are informed of proper handling and emergency procedures for these products and for mercury.
- All mercury switches are removed from the vehicle as soon as possible.
- Care is taken not to break or puncture the mercury container during removal.
- The mercury containing ampule or device is only removed over or in a containment device.
- Mercury switches are stored in a leak-proof, closed container in a way that will prevent the capsules from breaking.
- The area in which the ampules or device are removed is well ventilated.
- Storage containers are properly labeled.
- Devices are not stored for more than one year. Accumulation start dates are recorded on storage containers.
- Mercury switches are recycled with a metals recycler licensed to reclaim mercury.

BMPs for oil-soaked floor dry and absorbent pads:

- Oil-soaked absorbent material is swept up and stored in a leak-proof container until disposal.
- Used absorbent material is not placed in vehicles to be crushed.
- Oil-soaked absorbent pads are stored in leak-proof containers until they are picked up by an outside recycler.
- Oil-soaked absorbent material is disposed of properly through an outside vendor.

BMPs for battery handling and battery storage areas:

- Batteries are managed as a universal waste at this facility.
- Batteries are stored indoors on pallets in an organized manner.
- Small spills are neutralized with common baking soda, lime, or cement. Eye protection and gloves are worn during clean-up.
- Batteries are stored in an upright position to prevent leakage from vent holes.
- Batteries are not stacked more than three high.
- When transporting lead-acid batteries, they are loaded to prevent short-circuiting, becoming damaged or leaking acid.

- Effort is made to accumulate as few lead-acid batteries as possible.
- Lead-acid batteries are sold or sent to authorized recyclers.
- Employees are trained on proper handling of lead-acid batteries, specifically leaking batteries. Hands are washed after handling lead-acid batteries.
- Broken or leaking batteries must be managed as hazardous waste.

BMPs for management and recovery of refrigerants/CFC's:

- U-Pick-It Inc. contracts with an outside company to come on-site and recover refrigerants from vehicles.
- Refrigerants are recovered prior to removing parts and crushing vehicles.
- Certified technicians are used for refrigerant recovery.
- Accurate records are kept for at least 3 years.

BMPs for tires:

- Waste tires are stored indoors in a designated area.
- Sellable tires are resold.
- Scrap tires are placed in vehicles to be crushed and sent to the shredder.
- Scrap tires are not burned or buried.

BMPs for management and recycle of window-washing fluid:

- Window-washing fluid is drained during processing and before a vehicle is stored in the yard.
- Window-washing fluid is mixed with used/waste antifreeze.
- Window-washing fluid and used/waste antifreeze mixture is recycled with an outside company.

BMPs for management and recycle of used brake fluid:

- Brake fluid is not poured down drains or on the ground.
- Brake cleaner is not sprayed around brake fluid.
- Brake fluid is managed as used oil.
- Brake fluid is mixed with used oil and recycled.

BMPs for management and recycle of used transmission fluid/gear oil:

- Transmission fluids are managed like used oil.
- Transmission fluid is not disposed of in storm drains, dry wells, sewer systems, or dumpsters.
- Fluid from transmission filters is removed using proper draining methods.
- Undrained filters are not put into dumpsters.

BMPs for handling used fuel:

- Removed fuel is used as vehicle and equipment fuel by the salvage yard.
- Removed fuel is stored under cover in an aboveground storage tank on a level surface with secondary containment.
- Absorbent material is stored nearby the storage tank.
- Removed fuel is never mixed with other wastes.
- Vehicle fuel tanks are fully drained and vented before being vehicles are stored.

BMPs for used antifreeze:

- Antifreeze is drained from radiators and heater cores as soon as possible.
- Used antifreeze is kept free from cross-contamination with listed or characteristic hazardous wastes. Used antifreeze is mixed with used/waste window washing fluid.
- Antifreeze is stored in an aboveground storage tank on a level surface with secondary containment.
- Waste antifreeze from various sources is bulked resulting in a dilution of potentially hazardous constituents to nonhazardous levels.
- Antifreeze is recycled with an antifreeze recycler.
- Antifreeze is not disposed of down storm drains, in dry wells, or on bare ground.

BMPs for vehicle crushers:

- Vehicles are adequately drained prior to crushing.
- The vehicle crusher is located indoors on a concrete surface.
- The crusher has a collection/holding tank to catch residual fluids that drain during crushing.
- Mercury switches are removed from vehicles prior to crushing.
- The crushing area is cleaned up once crushing is completed.
- The crusher is regularly inspected for spills, leaks, and malfunctioning, worn, or corroded parts.

BMPs for inbound recyclable scrap metal:

- Inspections are conducted on materials brought in for recycling to minimize the chance of accepting materials that could be sources of pollution.
- Employee training is provided to personnel engaged in the inspection and acceptance of inbound recyclable materials.
- Information and education is provided to suppliers on what materials will and will not be accepted.
- Accepted scrap metal is stored indoors undercover.

Sector Specific BMPs

The following are sector specific best management practices that have been identified for **Sector M – Automobile Salvage Yards** and have been implemented at U-Pick-It Inc.:

- Vehicles arriving at the site will be inspected for leaks immediately upon arrival or as soon thereafter as feasible.
- Vehicles to be processed will be drained of all fluids upon arrival at the site or as soon thereafter as feasible, or some other means used to prevent spills and leaks.
- Areas used for fluid storage will be inspected regularly for signs of leakage.
- Employee training will address proper handling (collection, storage, and disposal) of used oil, antifreeze, fuel, solvents, and mercury switches.
- To help manage storm water runoff, the facility owner will consider using berms if oily parts are stored uncovered outdoors and will consider installation of filtering devices or oil/water separators as needed to manage runoff.

The following are sector specific best management practices that have been identified for **Sector N – Scrap Recycling Facilities** and have been implemented at U-Pick-It Inc.:

- Inspections of inbound recyclables are conducted to minimize the chance of accepting materials that could be significant sources of pollutants.
- Contact of storm water runoff with stockpiled materials will be minimized.
- Dedicated containment areas have been established for all turnings exposed to cutting fluids.
- Major suppliers have been notified with scrap materials will not be accepted at the facility or will be accepted only under certain conditions.

Controls on Other Specific Activities

Spent Antifreeze is managed according to according to the Missouri Department of Natural Resources Antifreeze Waste Management Guide PUB000114. Antifreeze from various sources is bulked together as allowed by regulations. The bulked mixture of spent antifreeze is presumed to be nonhazardous as long as it is not mixed with other listed or characteristic waste. Therefore the volume of antifreeze generated at this facility doesn't contribute to their universal waste quantity handler status, or their hazardous waste generator status.

As of August 28, 1994 and according to 10 CSR 25-11.279 used oil is no longer considered a hazardous waste given that the used oil is recycled. Therefore the volume of used oil generated at this facility doesn't contribute to their universal waste quantity handler status, or their hazardous waste generator status.

Spent batteries are handled as a universal waste. In order to be managed as a universal waste the spent batteries must be sent to a recycling facility, a resource recovery facility or a permitted lead smelter. U-Pick-It, Inc. also manages their spent lamps and mercury switches as a universal waste as allowed in the universal waste rule in Missouri. In order to be managed as a universal waste spent lamps and mercury switches must be sent to another universal waste handler, to an authorized universal waste destination facility, or to a Missouri Certified Resource Recovery Facility. U-Pick-It, Inc. generates approximately 400 batteries per month. A portion of these batteries are useable batteries that are then resold to customers at this facility. Batteries that are not being resold are scheduled for weekly pickup. U-Pick-It, Inc. also generates one to two spent fluorescent lamps on an infrequent basis and approximately 100 - 150 mercury switches per month. The quantity of batteries, spent lamps, and mercury switches generated at U-Pick-It, Inc. will contribute to their universal waste quantity handler status. U-Pick-It, Inc. accumulates less than 11,000 lbs of universal waste at their facility. Their universal waste quantity handler status is small quantity handler.

Sodium azide modules on select undeployed air bags are considered a hazardous waste. Fuel filters will also be managed as a hazardous waste. Therefore the quantity of sodium azide modules and gasoline dispenser fuel filters generated will contribute to U-Pick-It, Inc.'s hazardous waste generator status. Given the combination of sodium azide modules and fuel filters, U-Pick-It, Inc. does not generate more than 220lb per month combined. Given that this is the only hazardous waste generated at the facility, U-Pick-It, Inc. hazardous waste generator status is conditionally exempt small quantity generator.

Section 6: FACILITY INSPECTIONS

Maintenance and Repairs of Control Measures

Quarterly Routine Facility Inspection

Annual Comprehensive Site Compliance Inspection

Quarterly Storm Water Visual Examination

Facility Inspections

Storm water facility inspections are to be conducted at least quarterly to ensure that the Storm Water Pollution Prevention Plan (SWPPP) is being effectively carried out.

Also an annual Comprehensive Site Compliance Inspection will be conducted. The inspections should include all areas of the facility affected by the requirements of this permit, including areas in the SWPPP as potential pollutant sources where industrial materials or activities are exposed to storm water, any areas where control measures are used to comply with the effluent limits contained in a site specific NPDES permit, and areas where spills and leaks have occurred in the past 3 years. Your annual comprehensive site inspection may also be used as one of the routine inspections, as long as all components of both types of inspections are included.

Inspections can be conducted more frequently and U-Pick-It Inc. does perform regular visual inspections in addition to the quarterly facility inspections. Daily walkthroughs and drive-arounds are done to look for things out of the ordinary. Records of the quarterly Facility Inspections and the annual Comprehensive Site Compliance Inspections are maintained for at least three years and include who conducted the inspections; the date the inspections were conducted; the findings of the inspections; any corrective actions taken; and the date the corrective actions were implemented.

The facility inspection forms on the following pages shall be used for maintenance and repair of control measures, the quarterly Facility Storm water inspections, quarterly Visual Assessment of Storm water Discharges, and the annual Comprehensive Site Compliance inspection.

The Quarterly Routine Facility Inspection, Annual Comprehensive Site Compliance Inspection, and the Quarterly Storm Water Visual Examination are not required to be performed under permit MO-R60A000. However U-Pick-It is conducting these inspections in anticipation of the new permit that will be released on May 29, 2013 possibly requiring these inspections.

The Missouri State Operating Permit, General Permit for motor vehicle salvage yards and scrap metal recycling operations requires that U-Pick-It Inc. submit an annual operating report each year. The report must be submitted to the **Kansas City Regional Office, 500 BE Colbern Rd., Lee's Summit, MO 64086** by **October 28** each year. The report shall detail any unusual occurrences such as spills, tank failures or overflows, ruptured piping, fish kills, firefighting activities, or other upsets which resulted in any loss of product. Product includes, but is not limited to, fuels, oils, other fluids, and paints. The report shall also detail any remedial work under taken to recover product or clean up the site. The report must also indicate if nothing unusual has occurred. The Kansas City Regional Office will supply U-Pick-It Inc. with a template form to be completed and submitted each year.

Maintenance and Repairs of Control Measures

Documentation of maintenance and repairs of control measures				
Control Measure (any BMP or effluent limitations)	Date of regular maintenance	Date of discovery of areas in need of repair/replacement:	Date the control measure(s) returned to full function	Justification for extended maintenance/repair schedules.

Quarterly Routine Facility Storm Water Inspection Form

(Not required for Missouri State Operating Permit MO-R60A000. Permit MO-R60A000 will expire May 29, 2013. The new permit may require Quarterly Routine Facility Inspections)

Date: _____

1. Are there industrial materials, residue, or trash on the ground that could contaminate or be washed away in storm water?

Corrective

Action: _____

Date Implemented: _____

2. Are there any leaks or spills from industrial **equipment?**
drums?
tanks?
dumpsters?
Other containers_____?

Corrective

Action: _____

Date Implemented: _____

3. Is there offsite tracking of industrial materials or sediment where vehicles enter or exit the site?

Corrective

Action: _____

Date Implemented: _____

4. Is there tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas?

Corrective

Action: _____

Date Implemented: _____

5. Is there evidence of pollutants entering the drainage system?

Corrective

Action: _____

Y N N/A

Y N N/A

Y N N/A

Y N N/A

Y N N/A

Y N N/A

Y N N/A

Y N N/A

Y N N/A

Date Implemented:_____				
6. Inspection of Outfalls: Are BMPs effective in preventing significant impacts to receiving waters? Note any corrective action for inspected outfalls.		Y	N	N/A
Corrective Action:_____				
Date Implemented:_____				
7. Are the following Best Management Practices (BMPs) being observed?				
Housekeeping (circle one)	Good Fair Needs Improvement			
Minimize Exposure	Are industrial activities inside or protected from rain?	Y	N	N/A
Preventative Maintenance	Has routine maintenance of equipment been performed?	Y	N	N/A
Spill Prevention & Response	Are spill response kits fully equipped & in proper place?	Y	N	N/A
Sediment & Erosion	Is there evidence of significant soil erosion?	Y	N	N/A
Management of Runoff	Are measures implemented to prevent pollutants from entering storm water runoff?	Y	N	N/A
Corrective Action:_____				
Date Implemented:_____				
8. Is the Pollution Prevention Team identified in the Storm Water Pollution Prevention Plan current?		Y	N	N/A
Corrective Action:_____				
Date Implemented:_____				
9. Is the Facility Site Map accurate?		Y	N	N/A
Corrective Action:_____				
Date Implemented:_____				
10. Have any spills occurred since the last inspection? If so, confirm they have been recorded in the spill record in the Storm Water Pollution Prevention Plan.		Y	N	N/A
Corrective Action:_____				

Date Implemented:_____

11. Has your annual pollution prevention employee training been performed and documented?

Y N N/A

Corrective

Action:_____

Date Implemented:_____

12. Has the annual review of your Storm Water Pollution Prevention Plan been completed and signed off in the SWPPP?

Y N N/A

Corrective

Action:_____

Date Implemented:_____

13. Note any observations during inspection:

Inspection Team Members present during inspection:_____

Report completed by:_____

Annual Comprehensive Site Compliance Inspection

(Not required for Missouri State Operating Permit MO-R60A000. Permit MO-R60A000 will expire May 29, 2013. The new permit may require an Annual Comprehensive Site Compliance Inspection)

Reporting Period: _____

Date Evaluation Completed: _____

Completed by: _____

1. How many routine facility inspections were performed during the reporting period?

2. List deficiencies noted during the routine facility inspections performed for this period. (use back of form if additional space is needed)

Date	Deficiencies	Corrected (Y or N)	Date Corrected

3. What must be done to correct deficiencies that remain unresolved?

4. Were all BMPs indicated as being used in the SWPPP, including good housekeeping practices, implemented at the time of the Annual Comprehensive Site Compliance Inspection?

Yes_____ No_____

5. If one or more BMPs were not being implemented, were corrective actions taken after the FIRST inspection to find the problem?

- Yes_____ No_____
6. For this period was/were the same failure(s) to implement BMP deficiency(ies) noted in more than one inspection?
- Yes_____ No_____
7. Did any routine facility inspections for this period find that one or more BMPs were not effective in controlling the pollutant source for which it was designed?
- Yes_____ No_____
8. If one or more ineffective BMPs were found, have they been replaced with an alternative or modified BMP?
- Yes_____ No_____
9. At any time during the reporting period were there any known prohibited discharges from the facility?
- Yes_____ No_____
10. Have all prohibited discharges, if any, (including a discovered during previous years) been eliminated or permitted?
- Yes_____ No_____ Permit Applied for _____ No known prohibited discharges

11. Have any significant spills or leaks occurred at the facility during the reporting period?
- Yes_____ No_____
12. Were there any significant spills or leaks that entered the storm water conveyances (i.e. storm sewers or ditches)?
- Yes_____ No_____
13. During this report period were storm water BMPs observed during a storm water runoff event to ensure that they are functioning correctly?
- Yes_____ No_____
14. During this report period was there evidence of pollutants entering or discharging into drainage ditches or outfalls?
- Yes_____ No_____
15. Incidents of Suspected Non-compliance

Check the appropriate statement below:

_____ No incidents of suspected non-compliance were identified.

_____ Resolution to incidents of suspected non-compliance determined from this Comprehensive Site Compliance Inspection will be completed within 90 days and resolution noted in this report.

Resolution to incidents of suspected non-compliance:

Incident of Suspected Non-compliance	Resolution	Date Completed

If no non-compliances noted above, the facility is in compliance with the SWPPP & Permit.

16. Does the SWPPP need to be modified as a result of this evaluation?

Yes_____ No_____

Certification

I certify under penalty of law that I have read and understand the requirements for completing this Comprehensive Site Compliance Evaluation Report, which is to be completed annually. This report is also to be retained for at least three (3) years and will be made available to any State or Federal Inspector visiting this facility. I certify under penalty of law that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manager the system, or those persons directly involved in gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: _____ Date: _____

Signature: _____

Title: _____

Quarterly Storm Water Visual Examination Report

(Not required for Missouri State Operating Permit MO-R60A000. Permit MO-R60A000 will expire May 29, 2013. The new permit may require Quarterly Storm Water Visual Examination)

Outfall Number _____

Examination Date _____

Examination Time _____

Examination Personnel _____

Nature of Discharge (Circle One): Runoff Snow melt No storm event
resulting in runoff
during this report
period.

Visual Quality of the Storm water Discharge:

Parameter	Method	Results: Circle One
Color	Visual	Clear, yellow, red, blue, green, brown, black, milky, _____
Odor	Smell	None, earthy, sewage, musky, rotten eggs, petroleum, _____
Clarity or Turbidity	Use a clear plastic bottle, fill with sample and try to read newsprint through it. Also compare to a bottle of bottled water.	1) Can't see through bottle 2) Can see through it, but can't read newsprint 3) Can see through and can read newsprint 4) Pretty clear, but not as clear as bottled water 5) As clear as bottled water
Floating Solids	Visual	YES or NO If yes, describe:

Settled Solids	Use same clear bottle	Tablespoons or cups of material or millimeters of solids on bottom after 24 hours:
Suspended Solids	Look through container	What do you see?
Foam	Visual	YES or NO If yes, how thick is foam? How much of surface does it cover? What color is the foam?
Oil Sheen	Visual	Color and extent?
Other obvious indicators of SW pollution	Indicate what you observe	Describe:
Probable sources of any observed contamination		

Section 8: PERMITS

Missouri Department of Natural Resources

General Permit MO-R60A00
Application for General Permit
Permit Authorization